

Serial No.: 10/822,001
Docket No.: 101-1026
Amendment dated November 1, 2005
Reply to the Office Action of August 31, 2005

Amendments to the Drawings:

The attached sheets of drawings include changes to FIGS. 7 and 11. These sheets, which include FIGS. 7 and 11, replace the original sheets including FIGS. 7 and 11.

Attachment: Replacement Sheets

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REMARKS

Introduction

Applicants note with appreciation the Examiner's indication that claims 4-10 and 17-23 would be allowable if rewritten in independent form. Applicants also note with appreciation the Examiner's indication that each of the references cited in the Information Disclosure Statements of April 12, 2004 and July 12, 2005 have been considered.

Upon entry of the foregoing amendment, claims 1-28 are pending in the application. Claims 1-4, 7, 8, 14-18, 20, 21 and 24 have been amended. No claims have been cancelled. New claims 27 and 28 have been added. No new matter is being presented. In view of the following remarks, reconsideration and allowance of all the pending claims are requested.

Objections

Drawings

The Examiner has objected to the drawings under 37 CFR 1.84(p)(5) for failing to include reference numbers mentioned in the description. See Office Action of August 31, 2005 page 2, item 1. In accordance with the Examiner's requirement and the relevant provisions of 37 CFR, Applicants herewith submit substitute FIGS. 7 and 11 including reference numbers "341c," "342c," "342d," and "342e," as described in the specification at paragraph [0023].

Applicants respectfully request that this objection be withdrawn.

The Examiner has also objected to the drawings under 37 CFR 1.84(p)(5) because they allegedly include reference numbers 331b, 346, and 347 not mentioned in the description. See Office Action of August 31, 2005 page 2, item 2. However, Applicants respectfully point out that reference number "331b" is mentioned and described as "an upper seating portion" in paragraph [0029] of the specification; reference number "346" is mentioned and described as "a spring" in paragraph [0025] of the specification; and reference number "347" is mentioned and described

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as “a slant surface” in paragraph [0025] of the specification. Accordingly, Applicants respectfully request that the Examiner withdraw this objection.

Specification

The Examiner has objected to the specification because of minor informalities. See Office Action of August 31, 2005 page 3, item 3. Applicants have amended the specification as indicated by the Examiner. Accordingly, it is respectfully requested that the Examiner withdraw the objection.

Claims

The Examiner has objected to claims 2-11 and 15-23 as allegedly containing minor informalities. Applicants have amended the claims as indicated by the Examiner. Accordingly, it is respectfully requested that the Examiner withdraw the objection.

Rejections under 35 USC §102

Claims 1, 2, 13-15, and 26 have been rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,587,769 to Sawada et al. (Sawada). Applicants respectfully request reconsideration of these claims for at least the following reasons.

Claims 1, 2, and 13

Independent claim 1 has been amended to recite, among other things, “a frame disposed in the printer body and having the mounting location to receive a photosensitive unit and a transfer unit via the entrance of the printer body,” “a door to open and close the entrance of the printer body,” and “a locking unit, which is provided in the frame to be operable independently of the door to simultaneously lock and unlock the photosensitive unit and the transfer unit in the mounting location.” Applicants respectfully submit that Sawada does not disclose these features.

Sawada is directed to an image forming apparatus including a photosensitive unit 10 and an intermediate transfer unit 40 that are detachable from a movable frame 5 that is movably positioned against a printer body 1 when moved to a closed position. See Sawada col. 6, lines

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17-22 and FIGS. 2-4. The intermediate transfer unit 40 and the photosensitive unit 10 are installed on the movable frame 5, which is connected to the printer body 1 via a rotatable shaft 81, and is rotated to close the printer body 1. See Sawada col. 5, lines 50-55 and col. 6, lines 47-60. However, Sawada does not disclose "a door to open and close the entrance of the printer body," as presently recited in independent claim 1 of Applicants' invention. Instead, Sawada discloses the movable frame 5 including the photosensitive unit 10 and the intermediate transfer unit 40 to insert the units in the printer body 1. Applicants respectfully submit that the movable frame 5 shown in Sawada is not the same as "a door to open and close the entrance of the printer body," as presently recited in independent claim 1 of Applicants' invention. Thus, Sawada does not disclose all the features presently recited in independent claim 1.

Furthermore, in the Office Action, the Examiner cites column 6, lines 22-35 and figures 2 and 3 of Sawada to allegedly disclose "a locking unit," as recited in independent claim 1 of Applicants' invention. Thus, the Examiner appears to rely on "a unit positioning mechanism" (col. 6, line 16 of Sawada) including a series of channels 85a, 85b, and 85c disposed in the printer body 1 as allegedly being equivalent to the "locking unit" recited in claim 1. In particular, Sawada states that while the movable frame 5 is being closed, ends of shafts 11a, 43a, and 82 of the photosensitive unit 10 and the intermediate transfer unit 40 respectively engage the channels 85a, 85b, and 85c such that each shaft 11a, 43a, and 82 makes contact with the interiors of the channels 85a, 85b, and 85c, thereby positioning and locking each member at the predetermined positions. See Sawada col. 6, lines 29-35 and FIG. 3. Accordingly, the intermediate transfer unit 40 and photosensitive unit 10 shown in Sawada are received in the printer body 1 as the movable frame 5 is moved from outside the printer body 1 to be in contact with the printer body 1, thereby operating the channels 85a, 85b, and 85c and the shafts 11a, 43a, and 82 of the unit positioning mechanism. See FIGS. 3 and 4. In other words, the unit positioning mechanism, shown in Sawada and relied on by the Examiner, is operated by the movable frame 5, and cannot operate without the movable frame 5. As a result, Applicants respectfully submit that the unit positioning mechanism is not "independently operable" from the movable frame 5. Thus, even if the Examiner considers the movable frame 5 shown in Sawada as being equivalent to "a door," as presently recited in independent claim 1, Sawada would still

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fail to disclose "a locking unit, which is provided in the frame to be operable independently of the door to simultaneously lock and unlock the photosensitive unit and the transfer unit in the mounting location," since Sawada's unit positioning mechanism does not operate independently of the movable frame 5. Accordingly, Sawada fails to disclose all of the features presently recited in independent claim 1.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as contained in the... claim." Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). "The elements must be arranged as required by the claim..." In re Bond, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990). Accordingly, since Sawada does not disclose every element as recited in independent claim 1, Sawada can not be used to properly reject claim 1 under 35 U.S.C. § 102. Therefore, it is respectfully submitted that independent claim 1 is allowable over Sawada, and withdrawal of this rejection and allowance of this claim are earnestly solicited.

Applicants respectfully submit that for at least the reason that each of claims 2 and 13 depend from independent claim 1, and therefore contain all of the features recited in independent claim 1, these claims are therefore also patentable over Sawada. Accordingly, withdrawal of the rejection and allowance of these claims are earnestly solicited.

Claims 14, 15, and 26

Independent claim 14 has been amended to recite, among other things, "the photosensitive unit includes a damping member which shock-absorbingly contacts the transfer unit." Applicants respectfully submit that Sawada does not disclose this feature. In fact, this feature was previously recited in dependent claim 24, which the Examiner has not rejected as being anticipated by Sawada. Accordingly, since Sawada does not disclose every element as presently recited in independent claim 14, Sawada can not be used to properly reject claim 14 under 35 U.S.C. § 102. Therefore, it is respectfully submitted that independent claim 14 is allowable over Sawada, and withdrawal of this rejection and allowance of this claim are earnestly solicited.

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Applicants respectfully submit that for at least the reason that each of claims 15 and 26 depend from independent claim 14, and therefore contain all of the features recited in independent claim 14, these claims are therefore also patentable over Sawada. Accordingly, withdrawal of the rejection and allowance of these claims are earnestly solicited.

Claims 1-3, 11-16 and 24-26 have been rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Publication No. 2004/0009008 to Park et al. (Park). Applicants respectfully request reconsideration of these claims for at least the following reasons.

Claims 1, 2, and 11-13

Independent claim 1 has been amended to recite, among other things, “a locking unit, which is provided in the frame to be operable independently of the door...” Applicants respectfully submit that Park does not disclose these features.

Park is directed to a photoreceptive unit 100 and transfer unit 200 disposed in a frame 320 to be installed in a predetermined position by a locking unit including a locking lever 330 that performs locking and unlocking of the transfer unit 200 and the photoreceptive unit 100 according to an operation of opening and closing of a door 310. See Park paragraph [0029] and FIG. 9. The locking lever 330 is connected to the door 310 via link members 341 and 342 and is rotated when the door 310 is opened or closed. See Park paragraph [0032] and FIG. 9. Thus, since the locking lever 330 disclosed in Park is attached to the door 310, the locking lever 330 is operated by the door 310 and cannot be operated independently of the door 310. As a result, Park does not disclose “a locking unit, which is provided in the frame to be operable independently of the door...,” as presently recited in independent claim 1 of Applicants’ invention. Accordingly, since Park does not disclose every element as presently recited in independent claim 1, Park can not be used to properly reject claim 1 under 35 U.S.C. § 102. Therefore, it is respectfully submitted that independent claim 1 is allowable over Park, and withdrawal of this rejection and allowance of this claim are earnestly solicited.

Applicants respectfully submit that for at least the reason that each of claims 2, 3, and 11-13 depend from independent claim 1, and therefore contain all of the features recited in

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independent claim 1, these claims are therefore also patentable over Park. Accordingly, withdrawal of the rejection and allowance of these claims are earnestly solicited.

Claims 14-16 and 24-26

Independent claim 14 has been amended to recite, among other things, "the photosensitive unit includes a damping member which shock-absorbingly contacts the transfer unit." Applicants respectfully submit that Park does not disclose these features.

As described above, Park is directed to a photoreceptive drum 110 and transfer unit 200 disposed in a frame 320 to be installed in a predetermined position in the frame 320. See Park paragraph [0029] and FIG. 9. The Examiner relies on paragraph [0031] of Park to disclose "a damping member," as recited in independent claim 1 of Applicants' invention. However, paragraph [0031] of Park does not disclose or even mention "a damping member which shock-absorbingly contacts the transfer unit." Moreover, Applicants respectfully submit that "a damping member which shock-absorbingly contacts the transfer unit" is not disclosed anywhere in Park. Thus, Park does not disclose all of the features presently recited in independent claim 14 of Applicants' invention.

Accordingly, since Park does not disclose every element as recited in independent claim 14, Park can not be used to properly reject claim 14 under 35 U.S.C. § 102. Therefore, it is respectfully submitted that independent claim 14 is allowable over Park, and withdrawal of this rejection and allowance of this claim are earnestly solicited.

Applicants respectfully submit that for at least the reason that each of claims 15, 16, and 24-26 depend from independent claim 14, and therefore contain all of the features recited in independent claim 14, these claims are therefore also patentable over Park. Accordingly, withdrawal of the rejection and allowance of these claims are earnestly solicited.

Allowed Claims

Dependent claims 4-10 and 17-23 have been objected to as being allowable if rewritten in independent claim form.

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New Claims 27 and 28

Claims 27 and 28 have been newly added. New claim 27 recites similar features as those recited in independent claims 1 and 14 which as pointed out above, are not disclosed, taught, or suggested in the prior art of record, such as, for example, "a locking unit disposed in the frame and including a rotating lever extending from the frame in the opening to be rotatable in the opening when the photosensitive unit and the transfer unit are in the seated position within the frame such that the photosensitive unit and the transfer unit are locked in a locked position within the frame." Applicants respectfully submit that support for newly added claims 27 and 28 can be found in FIGS. 9 through 11 of the specification. Accordingly, it is respectfully submitted that new claims 27 and 28 do not present new matter, and are allowable over the prior art of record, and allowance of these claims is earnestly solicited.

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Conclusion

It is respectfully submitted that a full and complete response has been made to the outstanding Office Action and, as such, there being no other objections or rejections, this application is in condition for allowance, and a notice to this effect is earnestly solicited.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided below.

A fee of \$100 has been incurred for the addition of new claims. If any further fees are required in connection with the filing of this amendment, please charge the same to our Deposit Account No. 502827.

Respectfully submitted,

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